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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RAMON SUERTO, an Individual, and
GLORIA SUERTO, an Individual,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY dba STATE
FARM an entity licensed to do business in the
State of Nevada; DOES 1 through 10; and
ROE CORPORATIONS 1 through 10,
inclusive,

Defendants.

CASE NO.: 2:25-cv-00318-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY (Second Request)**

Plaintiffs, RAMON SUERTO and GLORIA SUERTO (“Plaintiffs”), by and through their counsel of record, RIVERA LAW GROUP PROF. LLC, and Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (“Defendant”), by and through its counsel of record, HARPER | SELIM, (collectively, “the Parties”) submit the following Stipulation and proposed Order pursuant to LR 26-3 hereby agreeing to a ninety (90) day continuance (second request) of the current discovery deadlines.

I. STATEMENT OF DISCOVERY COMPLETED TO DATE

1. The Parties participated in the Rule 26(f) conference on April 9, 2025.
2. Defendant served its Rule 26(a)(1) Initial Disclosure on April 23, 2025.
3. Plaintiffs served their Rule 26(a)(1) Disclosure on May 2, 2025.

1 4. Plaintiffs served their First Supplement to Rule 26(a)(1) Disclosure on July 8, 2025.

2 5. Defendant served its First Supplement to Rule 26(a)(1) Initial Disclosure on July 17,
3 2025.

4 6. Defendants served its First Set of Interrogatories, Requests for Production of
5 Documents, and Requests for Admissions to Plaintiff, Ramon Suerto, on July 17, 2025. Mr. Suerto is
6 expected to respond to said discovery requests before or on August 29, 2025.

7 7. Defendants served its First Set of Interrogatories, Requests for Production of
8 Documents, and Requests for Admissions to Plaintiff, Gloria Suerto, on July 17, 2025. Mrs. Suerto
9 is expected to respond to said discovery requests before or on August 29, 2025.

10 8. Plaintiffs served their First Supplement to Rule 26(a)(1) Disclosure [sic] on August 5,
11 2025.

12 9. Plaintiffs served their Second Supplement to Rule 26(a)(1) Disclosure on August 6,
13 2025.

14 10. Defendant took the deposition of Plaintiff, Ramon Suerto, on August 13, 2025.

15 11. Defendant took the deposition of Plaintiff, Gloria Suerto, on August 13, 2025.

16 **II. STATEMENT OF DISCOVERY THAT NEEDS TO BE COMPLETED**

17 1. Written Discovery, as necessary

18 2. Depositions, as necessary

19 3. Initial Expert Disclosures

20 4. Rebuttal Expert Disclosures

21 5. Expert Witness Depositions, as necessary

22 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

23 Plaintiffs and Defendant have been diligently pursuing discovery in this matter, including
24 serving their initial and supplemental disclosures, requesting records, and conducting certain
25 depositions. However, the Parties concur that additional time is warranted for several reasons.

26 First, Defendant requested and received executed HIPAA authorizations from Ramon Suerto
27 and Gloria Suerto to obtain records and bills from their respective medical providers. Defendant has
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1 not yet received responses or the requested records and bills from many of the identified medical
2 providers and requires additional time to obtain and review these records in preparation for ongoing
3 discovery efforts.

4 Second, Defendant conducted the depositions of Plaintiffs, Ramon Suerto and Gloria Suerto,
5 on August 13, 2025. During the depositions, Plaintiffs disclosed the identities of additional unknown
6 treating physicians, both prior to and for the underlying motor vehicle accident. In addition, both
7 Plaintiffs also testified that they were suffering from residual injuries, despite almost two years of
8 not undergoing medical care and treatment, and that they intend to seek future medical care and
9 treatment as a result of the underlying motor vehicle accident. Accordingly, Defendant is seeking to
10 retain a medical expert to review Ramon Suerto's and Gloria Suerto's medical records and conduct
11 Rule 35 examinations of Plaintiffs. Defendant's proposed medical doctor, however, has advised that
12 his earliest availability to conduct the requested records review and Rule 35 examinations would be
13 in October. Because the medical records review and Rule 35 examinations are necessary to the
14 causation and damages claims and defenses in this matter, Defendant requires sufficient time to
15 obtain and review all medical records, retain the appropriate medical expert, conduct the requested
16 Rule 35 examinations, and disclose reports pursuant to NRCP 16.1.

17 Thus, while Plaintiffs and Defendant have been diligent in moving this case forward,
18 additional time is needed to allow the Parties to obtain and review all medical records (prior and
19 present) and retain the appropriate expert. Accordingly, Plaintiffs and Defendant have agreed to
20 extend the current discovery deadlines by ninety (90) days.

21 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

22 It is hereby stipulated that the discovery cutoff deadline be extended for a period of ninety
23 (90) days. If approved, the new discovery deadline would be modified as follows:

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Task	Current Deadline	Proposed Deadline
Last day to amend pleadings and add parties	Closed	Closed
Last day to disclose initial experts and reports	September 25, 2025	November 25, 2025
Last day to disclose rebuttal experts and reports	October 27, 2025	December 26, 2025 ¹
Discovery cutoff	November 24, 2025	February 23, 2026 ²
Last day to file dispositive motions	December 24, 2025	March 25, 2026
Last day to file Pre-Trial Order (if no dispositive motions are filed)	January 23, 2026	April 24, 2026

DATED this 19th day of September, 2025.

DATED this 19th day of September, 2025.

RIVERA LAW GROUP PROF. LLC

HARPER | SELIM

/s/ Tristan Rivera

/s/ James E. Harper

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IT IS SO ORDERED this 19th Day of September, 2025.


UNITED STATES MAGISTRATE JUDGE

¹ This deadline falls on Thursday, December 25, 2025, a recognized holiday. As a result, this deadline extends to the next court day of Friday, December 26, 2025, by operation of FRCP 6.

² This deadline falls on Sunday, February 22, 2026. As a result, this deadline extends to the next court day of Monday, February 23, 2026, by operation of FRCP 6.